

AFFIDAVIT OF REBECKA SHAW

STATE OF OKLAHOMA)
) SS.
COUNTY OF OKLAHOMA)

Affiant, Rebecka Shaw, of lawful age and being first sworn upon oath, attests as follows:

1. I have been employed by The City of Oklahoma City since December 7, 1984, and have been the Personnel Operations Manager since August 8, 2009.
2. As the Personnel Operations Manager, I am in charge of the Personnel Operations Division, including Employment Services, Classification and Compensation and Human Resource Information Systems.
3. I am familiar with the facts surrounding the reclassification of the Records Coordinator to a Unit Operations Leader in the Municipal Courts Department.
4. On October 21, 2008, the City of Oklahoma City contracted with the Waters Consulting Group to perform a classification study of positions within the City of Oklahoma City. One of those positions was the Records Coordinator position in the Municipal Courts Department. In order for the Waters Group to determine whether the employees were classified properly, the Waters Group had employees fill out detailed surveys about their job duties and responsibilities. The Records Coordinator who filled out this survey was the Plaintiff's predecessor, Tina Smith.
5. On September 30, 2010, the Waters Group reported to the City of Oklahoma City that the Records Coordinator (pay range 513) classification, occupied by the Plaintiff, was not the appropriate classification for the tasks she performed. The Waters Group determined the appropriate classification would be Unit Operations Leader (pay range 512).
6. The City adopted an implementation policy that placed individuals reclassified by the Waters Group study in their new pay ranges at the closest step with no loss of pay. Prior to the reclassification, the Plaintiff was in pay range 513/step 3 at a compensation rate of \$23.02. She was reclassified to pay range 512/step 5 at a compensation rate of \$23.50.



7. Had the Plaintiff remained classified as a Records Coordinator she would have stayed at the compensation rate of \$23.02. The change in classification resulted in a higher compensation rate.
8. The classification changes were initiated on October 19, 2011 with a July 1, 2011 effective date.

FURTHER AFFIANT SAYETH NOT.

DATED this 29th day of May, 2013.



Rebecka Shaw, Personnel Operations Manager
The City of Oklahoma City

SUBSCRIBED AND SWORN to before me on this 29th day of May, 2013.


Notary Public

My Commission Expires:

